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## Ny styringsstruktur for energipolitikken i EU (governance) – synspunkter fra Energi Norge

Vi viser til møtet i kontaktutvalget for energi (EU/EØS) den 24. mars og til EUs uformelle ministermøte i Riga den 15.-16. april der Norge deltar etter det vi forstår. Under det uformelle ministermøtet i Riga vil blant annet spørsmålet om en ny styringsstruktur for oppnåelsen av 2030-målene for klima og energi samt forholdet til energiunionen diskuteres (governance).

Energi Norge er opptatt av at Norge deltar aktivt i den faglige og politiske debatten uavhengig av EØS-relevansen av styringsstrukturen fordi den uansett indirekte vil påvirke rammebetingelsene for norsk fornybarnæring i betydelig grad.

Vi har følgende synspunkter (på engelsk) som vi håper departementet vil kunne slutte seg til og bringe videre i dialogen med EU. Energi Norge ser frem til videre diskusjoner.

### 1. Objectives

The objectives of the governance system should be the following:

- Ensure that Europe proceeds towards the targets for the Energy Union and the 2030 targets without compromising security of supply, competitiveness, and sustainability.
- Fully integrate the European energy market to allow the efficient integration of RES and give clear price signals for both producers and consumers to invest in flexibility and to provide a stable and transparent framework for investors along the whole value chain (generation facilities, networks, interconnectors, energy efficiency, demand etc.)
- Facilitate better coordination of national energy policies
- Facilitate better regional/cross-border cooperation within the EU and with the EEA countries in implementing the targets

### 2. National energy plans

The governance system is based on a system with national plans. These National Energy Plans should address:

- Progress with implementation of legislation related to the completion of the internal energy market within the framework of the Energy Union – special focus now should be on the establishment of functioning retail markets and balancing markets, and the integration of RES into the market.

- Measures to reach the national GHG targets for the non-ETS sector
- Energy demand projections and energy efficiency measures
- RES projections and RES measures
- Assessment of how the planned measures fit to internal energy market incl. cross-border effects, and compatibility with the EU ETS
- Ambition and plans for enablers of fulfilling the EU targets for 2030, including infrastructure, market integration of renewables (participation to all timeframes and responsibility to balancing obligations), permitting procedures etc.
- Measures to drive innovation, new jobs and competitiveness
- Costs for consumers and taxpayers, budget considerations

### 3. Regional cooperation

Regional cooperation is a key to the achievement of energy objectives.

- Regional cooperation should be promoted from the early stages of national policy drafting.
- The governance system should facilitate better coordination and minimised overlap of policies, more integrated markets and more harmonized rules.
- It should be based on a dialogue with third countries, in particular EEA-countries, the Energy Community countries and other countries whose energy system is strongly connected to the EU internal energy market.
- Regional cooperation between TSO, possibly with a Regional TSO, should be further enhanced and strengthened. The role of the national regulators, their regional cooperation should also be strengthened correspondingly and, possibly also with increased focus from ACER on the ENTSO-Es actions.

### 4. Indicators

The governance system should be based on objective, clear indicators measuring progress.

The Commission's proposed key energy indicators are:

1. Energy price differentials between the EU and major trading partners, building on the report on energy prices and costs.
2. Diversification of energy imports and the share of indigenous energy sources used in energy consumption over the period up to 2030.
3. Deployment of smart grids and interconnections, with particular urgency between those countries that are further away from meeting the already agreed objective to ensure a level of electricity interconnections equivalent to or beyond 10% of their installed production capacity. Coupling of energy markets, building on the liberalisation of gas and electricity markets achieved already by EU legislation.
4. Competition and market concentration on wholesale and retail energy markets both at the national and (in particular in regions with functioning coupling) at the regional level.
5. Technological innovation (R&D expenditure, EU patents, competitive situation on technologies compared to third countries).

We find this helpful in assessing the progress towards a competitive and integrated market (coupling of markets, construction of interconnections, market concentration), the preservation of security of power supply (diversification of energy imports) and the current and future competitiveness of the European economy (end user prices differentials between the EU and its main trading partners, technological innovation).

In addition, we propose indicators concerning:

- Energy prices and the different components of the energy bill, including the policy support costs and taxes as well as the difference between wholesale and retail prices. energy price differentials with neighbouring member states as observed on the wholesale markets for electricity and gas (historic, current and expectations for a number of years ahead)
- Integration of power from RES in the electricity systems and driving RES at an affordable cost, which are key to preserving competitiveness. This includes
  - the shares of RES subject to balancing and ancillary services obligations,
  - the share of RES supported by market oriented mechanisms with volume control as defined in the EEAG,
  - the share of RES developed with the EU ETS as the driver and
  - the share of RES developed as part of international cooperation
- The shares of low carbon energy (RES, CCS, nuclear) in the different sectors (electricity, heat and cold, transport) and the abatement costs of CO2 emissions when not directly driven by ETS EUA prices
- The share of emissions-free energy use at the end-user level, in particular in the transport and building sector, preferably through an indicator on the level of electrification
- National capacity remuneration mechanisms (CRM), including costs and conditions for cross-border participation

Vennlig hilsen



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